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September 15, 2006

Ms. Kelly Sherman
U.S. EPA Office of Pesticide Programs
Document Processing Desk
Room S-4900
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Dear Kelly,

Dr. Bob Rosenberg, National Pest Management Association, forwarded a copy of an e-mail he sent to you on September 13, 2006. The contents are proposed mitigation measures.

I work for Bell Laboratories, Inc. headquartered in Madison, WI. We are a major manufacturer of rodenticide products. We market products that contain the following six active ingredients: 1) bromadiolone, 2) brodifacoum, 3) bromethalin, 4) diphacione, 5) zinc phosphide, and, 6) cholecalciferol.

We do understand a need for mitigation measures regarding rodenticides. However, we disagree with NPMA's proposal that would allow outdoor uses only if applied by a certified or private applicator. This is too restrictive. I can understand why they made this proposal since NPMA serves in the best interest of pest control operators. As you are aware, the six active ingredients listed above all have different attributes and shouldn't be treated equally. Farmers and homeowners have enjoyed the benefit of placing rodenticides themselves. Farmers normally go to farm stores to purchase product and homeowners generally purchase their product in a retail store where numerous other consumer type products are available.

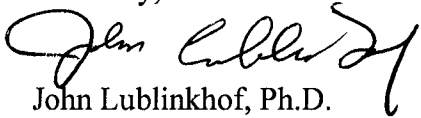
CDPR proposed restricting second- generation anticoagulants to "for indoor use only". I prepared a response which I sent to CDPR in a letter dated April 21, 2006. Fortunately, California has product use statistics (obtained from professional applicators) as well as data on wildlife incidents. This type of information is not readily available for most other states. In the attached letter with its supporting data, the conclusion is that brodifacoum and its use by consumers are very strongly linked to the wildlife incidents that were reported. Consequently, we proposed that CDPR **restrict the use of brodifacoum to licensed professional applicators, but allow outdoor uses in addition to indoor uses. Outdoor placements of brodifacoum should be in tamper resistant bait stations.** I believe this information from California can be used to justify a similar mitigation USA wide.

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9/19/06

In know the EPA is evaluating all aspects and weighing the risks and benefits thereof. I do believe restrictions need to be placed on brodifacoum but believe such restrictions are not warranted for the other active ingredients.

I would welcome the opportunity to visit with you regarding our proposal.

Sincerely,



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